

# EXHIBIT A

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**From:** Pete Patterson <[ppatterson@cooperkirk.com](mailto:ppatterson@cooperkirk.com)>  
**Sent:** Friday, October 3, 2025 1:01 PM  
**To:** Holt, Samuel (CIV) <[Samuel.Holt2@usdoj.gov](mailto:Samuel.Holt2@usdoj.gov)>  
**Cc:** David Thompson <[dthompson@cooperkirk.com](mailto:dthompson@cooperkirk.com)>; Will Bergstrom <[wbergstrom@cooperkirk.com](mailto:wbergstrom@cooperkirk.com)>  
**Subject:** [EXTERNAL] RE: Activity in Case 4:24-cv-00565-O Firearms Policy Coalition Inc et al v. Garland Memorandum Opinion and Order

Samuel, thank you for your response. We object to providing the government with a verified list of members. For one, it is not necessary for the government to comply with the injunction. Members can identify themselves as such if questioned about carrying a firearm in a post office. For another, the judgment is not limited to members at the time the complaint was filed. Regards,

Pete

Pete Patterson  
Cooper & Kirk, PLLC  
1523 New Hampshire Ave., NW  
Washington, D.C. 20036  
(202) 220-9670

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**From:** Holt, Samuel (CIV) <[Samuel.Holt2@usdoj.gov](mailto:Samuel.Holt2@usdoj.gov)>  
**Sent:** Friday, October 3, 2025 10:05 AM  
**To:** Pete Patterson <[ppatterson@cooperkirk.com](mailto:ppatterson@cooperkirk.com)>  
**Cc:** David Thompson <[dthompson@cooperkirk.com](mailto:dthompson@cooperkirk.com)>; Will Bergstrom <[wbergstrom@cooperkirk.com](mailto:wbergstrom@cooperkirk.com)>  
**Subject:** RE: Activity in Case 4:24-cv-00565-O Firearms Policy Coalition Inc et al v. Garland Memorandum Opinion and Order

**Caution: External Email**

Hello Counsel,

I am working with the appropriate federal entities to implement the injunction. However, as you pointed out in your email, the Court's permanent injunction is limited only to Plaintiffs and their members. Thus, to ensure that the federal government can appropriately comply with the Court's injunction, can Firearms Policy Coalition Inc. and Second Amendment Foundation please send us a verified list of their members as of the date the case was filed? Without a verified list of Plaintiffs' members, it would be impossible for the federal government to know whom the judgment applies. I would be happy to work with you all on a joint protective order that limits the government's use of

the member information to compliance with the Court's judgment and permanent injunction in this case.

If Plaintiffs object to providing us a verified list of members, the government plans on filing a motion for clarification or, in the alternative, for reconsideration, asking that the Court's judgment vis-à-vis the organizational plaintiffs be limited to individuals who (A) were members of the organizational plaintiffs when suit was filed and (B) have been identified and verified as members of the organizational plaintiffs during this case.

Could you let us know Plaintiffs' position by 10 AM on Monday, October 6?

Thank you,

Samuel Holt  
Trial Attorney  
U.S. Department of Justice  
Civil Division, Federal Programs Branch  
Phone: 202-674-9761

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**From:** Pete Patterson <[ppatterson@cooperkirk.com](mailto:ppatterson@cooperkirk.com)>

**Sent:** Friday, October 3, 2025 8:54 AM

**To:** Conner, Gregory (USAPR) <[Gregory.Conner2@usdoj.gov](mailto:Gregory.Conner2@usdoj.gov)>; Holt, Samuel (CIV) <[Samuel.Holt2@usdoj.gov](mailto:Samuel.Holt2@usdoj.gov)>

**Cc:** David Thompson <[dthompson@cooperkirk.com](mailto:dthompson@cooperkirk.com)>; Will Bergstrom <[wbergstrom@cooperkirk.com](mailto:wbergstrom@cooperkirk.com)>

**Subject:** [EXTERNAL] FW: Activity in Case 4:24-cv-00565-O Firearms Policy Coalition Inc et al v. Garland Memorandum Opinion and Order

Counsel,

I am writing to confirm that the injunction in this case is being implemented for the individual plaintiffs as well as the members of SAF and FPC across the country. Please confirm at your earliest convenience. Thanks!

Pete

Pete Patterson  
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